

No. PD-0703-16  
TO THE COURT OF CRIMINAL APPEALS

STEPHEN HOPPER  
APPELLANT

From the Fourteenth Court of Appeals,  
Number 14-15-00371-CR, Cause Number 673236  
from the 339th District Court, Harris County, Texas.

FILED  
COURT OF CRIMINAL APPEALS  
1/20/2017  
ABEL ACOSTA, CLERK

V.

THE STATE OF TEXAS  
APPELLEE

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**Appellant's Motion To Extend Time  
To File Response to State's Brief on the Merits  
ACCOMPANIED BY APPELLANT'S BRIEF**

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TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

COMES NOW, STEPHEN HOPPER, and files this his Motion to Extend, and in support thereof, would respectfully show the Court the following:

I.

The Appellant's Brief in Response to the State's Brief on the Merits was due on January 6, 2017. No other extensions have been requested.

II.

This motion is filed contemporaneously with the brief.

Appellant apologizes for the delay and explains that in addition to holiday travels during the briefing schedule in this case, counsel has undertaken new duties as the Motion for New Trial attorney for the Harris County Public Defender's Office and has been struggling to conclude her previous work load in addition to her new tasks. Additionally, counsel has been engaged in work in the Harris County Public Defender's Office on many cases and duties, including the following:

- *LT Lewis, 01-16-00485-CR*
- *Reginald Smith, 13-16-00185-CR*
- *Tairon Monjaras-Guirola, 01-15-01092-CR*
- *Emanuel Hayes, 01-15-00982-CR*
- *Janai Atkins, 01-16-00080-CR*
- *Lenin Lopez, 1403196*
- Counsel is the administrator for the Office's Future Appointed Counsel Training Program
- Counsel has been serving as the Educational Internship Coordinator and administrator of the Second Chair Program for the Harris County Criminal Lawyers Association
- Counsel has been researching and writing for several trial cases assigned to the Public Defender's Office Trial Division.

### III.

Appellant's attorney requests this brief extension which is necessary so that the brief can be thoroughly written and timely filed. This motion is not made for the purpose of delay.

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PRAYER

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WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Honorable Court grants this requested extension of time to file the appellant's petition for discretionary review in the above cause and extend the time for filing for 14 days, to January 20, 2017, or the day on which this Court deems the accompanying petition to have been filed.

Respectfully submitted,

ALEXANDER BUNIN  
Chief Public Defender  
Harris County, Texas

/s/Sarah V. Wood  
SARAH V. WOOD  
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Attorney for Appellant

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that a true and correct copy of the above and foregoing Appellant's Motion to Extend has been served on the District Attorney of Harris County, Texas, by electronic delivery through the efile system.

/s/Sarah V. Wood  
Sarah V. Wood